

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**Cr. No. H-23-0413**

**ABIGAIL JO SHRY**

**UNOPPOSED MOTION TO AMEND BOND**

Defendant, Abigail Jo Shry, moves this Court to amend her bond conditions to remove home detention and to add a curfew, and respectfully shows as follows:

Ms. Shry is charged with threat by interstate communication in violation of 18 U.S.C. § 875(c). In September 2023, she entered and successfully completed an inpatient substance-abuse treatment program. In November 2023, she was released on bond with a condition of home incarceration and intensive outpatient treatment. In December 2023, her supervision was reduced to home detention with GPS monitoring.

Ms. Shry is requesting to remove home detention as a condition of her bond, and to reduce her supervision to a curfew to be set by pretrial services. This will assist her in finding employment and with arranging transportation to her necessary appointments. Removing home detention will also appropriately reduce the resources required from pretrial services for her supervision.

The government and pretrial services are unopposed to this motion.

Respectfully submitted,

MARJORIE A. MEYERS  
Federal Public Defender  
Southern District of Texas No. 3233  
Texas State Bar No. 14003750

By /s/ Amr A. Ahmed  
AMR A. AHMED  
Assistant Federal Public Defender  
Southern District of Texas No. 3088803  
Virginia State Bar No. 81787  
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**CERTIFICATE OF CONFERENCE**

I certify that I conferred with Assistant United States Attorney Richard Hanes and United States Pretrial Officer Isabel Davila and determined that the United States and Pretrial are unopposed to this motion to amend bond.

By /s/ Amr A. Ahmed  
AMR A. AHMED

**CERTIFICATE OF SERVICE**

I certify that on January 30, 2024, a copy of the foregoing was served by Notification of Electronic Filing and will be delivered by email to the office of Assistant United States Attorney Richard Hanes and United States Pretrial Officer Isabel Davila.

By /s/ Amr A. Ahmed  
AMR A. AHMED